



WORKING GROUP ON COMMUNITY RIGHT-TO-KNOW

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RE: Environmental Compliance History Online (ECHO)

The Working Group on Community Right-to-Know submits these comments in response to the Environmental Protection Agency's request for public comments on its Environmental Compliance History Online web site (67 FR 70079, November 20, 2002). Since 1988, the Working Group has coordinated a national network of some 1,500 public interest organizations concerned with community right-to-know about toxic chemical hazards and pollution.

ECHO integrates historical compliance and enforcement information for specific facilities from some of EPA's major environmental statutes, including programs governing clean water, clean air, and hazardous waste, and presents these facility specific profiles on-line with census demographics for nearby communities. **ECHO is an important step toward creating an information rich environment that improves accountability of regulated facilities, transparency of government, public awareness of pollution and government, and compliance with environmental laws. We urge EPA to continue to develop and improve ECHO and to incorporate its use into the agency's daily operations.**

In addition to our general support, EPA requests comments in several specific areas.

1. Usefulness

- EPA should work with states to ensure that the states report complete information. Complete and uniform information nationwide will make ECHO more useful and valuable. Complete state reporting is one of the most basic issues facing EPA and the states. Laggard states should not be allowed to hold up the national system.
- EPA should work with states to add to the system "non-major" dischargers under the Clean Water Act. Such non-major dischargers account for the vast majority of facilities regulated under the Clean Water Act. In particular, the system should include information on violations, enforcement actions, and penalties for Clean Water Act non-major dischargers. Some states claim to have shifted enforcement to target these non-major dischargers to waterways. The public needs accurate information on such enforcement to understand the validity of this claim.
- Census data are useful to help people examine the potential impacts of pollution on nearby populations, and the social justice implications of facility siting and enforcement

histories. Such demographic information can help reveal patterns of enforcement, or lack thereof, for example in areas with more minority or lower income residents.

- A compliance history of just two years is too limited; we encourage EPA to extend the history over time to at least 10 years.

2. Navigation

Here are some specific suggestions to improve navigation:

- Instead of reports that read left to right with an "x" for each quarter year, reconfigure reports to read top to bottom. This will provide room for better interpretation. This will also allow EPA to go further back than just eight quarters.
- ECHO should enable users to click from a Detailed Facility Report to a new search.
- ECHO should enable users to click from Search Compliance Data for RCRA (for example) to a new search of compliance data for Clean Air Act or Clean Water Act (for example).
- ECHO should enable users to click from the bottom of each page back to the ECHO home page.
- The sort function on the Query Results Page is helpful.

3. Explanation

- Interpretation is extensive but is also the weakest part of ECHO. Changing the layout of reports as suggested above (top to bottom) would provide room for better explanation.
- The data dictionary is useful.
- More interpretation on non-compliance would help users determine the nature of the violation and what it means. Especially helpful would be to convert the reporting codes into something more intuitive.
- Information about when facilities were inspected, by whom, the type of inspection, and information from any resulting inspection report, would help provide context to ECHO users, and help people know what a violation means.

4. Features

- EPA should further develop the analytical capacity of ECHO to enable national searches, including state-to-state comparisons, in addition to providing information one facility at a time.
- ECHO should enable users to search by parent company. EPA could facilitate this feature by populating Dunn and Bradstreet fields in the agency's Facility Registry System, or EPA could use algorithms to match the name and address for every regulated facility in a manner that produces parent company information.

- ECHO should enable users to differentiate active from closed facilities. For this reason, EPA should require facilities that close or de-register from any major environmental program to notify the agency.
- ECHO should provide information on safe drinking water, including information on *both* enforcement and contaminants. EPA's Safe Drinking Water Information System is not user friendly and can be improved. EPA should complete, and ECHO should draw from, the National Contaminant Occurrence Database as required by the Safe Drinking Water Act of 1996.
- The ability to search water reports by watershed is visionary and valuable.
- ECHO is a natural place to integrate information on pending permit applications, renewals, or modifications, including renewal dates and the responsible regulatory agency.
- ECHO would be more powerful if it could automatically produce graphs upon request that show inspections, enforcement actions, and discharge violations over time relative to permit limits.

5. Accuracy

- ECHO helps bring data quality problems to light. Spotlighting and resolving data quality problems is a valuable function of the ECHO system. This includes revealing communication problems between agencies and between levels of government. ECHO can play a valuable role in obliging straggler state agencies to improve basic governmental functions. The ECHO error correction mechanism is an important mechanism to help improve data quality.

We urge EPA to continue to work nationwide to effectively collect, manage, analyze and disseminate facility compliance histories. Integrating disparate databases is vital for EPA, the states, and the public to obtain information to protect public health and the environment. We urge EPA to adequately fund ECHO as a step in the right direction to preventing pollution through better information.

Respectfully,



Paul Orum, Director
Working Group on Community Right-to-Know